

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF VERMONT**

CHAMBER OF COMMERCE OF THE  
UNITED STATES OF AMERICA and  
AMERICAN PETROLEUM INSTITUTE,

*Plaintiffs,*

v.

JULIE MOORE, in her official capacity as  
the Secretary of the Vermont Agency of  
Natural Resources and JANE LAZORCHAK,  
in her official capacity as the Director of the  
Vermont Agency of Natural Resources  
Climate Action Office,

*Defendants.*

Civil Action No. \_\_\_\_\_

**PLAINTIFFS RULE 7.1 CORPORATE DISCLOSURE STATEMENT**

Pursuant to Federal Rules of Civil Procedure Rule 7.1, Plaintiffs Chamber of Commerce of the United States of America (the Chamber) and American Petroleum Institute (API) make the following disclosures:

1. The Chamber states that it is a non-profit, tax-exempt organization incorporated in the District of Columbia. The Chamber has no parent corporation, and no publicly held company owns 10% or more of the organization.

2. API states that it is a non-profit trade association. It has no parent corporation. API does not issue stock. No publicly held company owns 10% or more of the organization.

Dated: December 30, 2024

Respectfully submitted,  
/s/ Matthew B. Byrne

Matthew B. Byrne  
GRAVEL & SHEA PC  
76 St. Paul Street, 7th Floor  
Burlington, VT 05402-0369  
Telephone: (802) 658-0220  
Fax: (802) 658-1456  
Email: [mbyrne@gravelshea.com](mailto:mbyrne@gravelshea.com)

Jennifer B. Dickey  
Kevin R. Palmer  
U.S. Chamber Litigation Center  
1615 H Street, NW  
Washington, DC 20062  
Telephone: (202) 463-5337

*Counsel for Plaintiff the Chamber of  
Commerce of the United States of America*

Ryan Meyers  
John Wagner  
American Petroleum Institute  
200 Massachusetts Avenue, NW,  
Suite 1200  
Washington, DC 20001  
Telephone: (202) 682-8000

*Counsel for Plaintiff American Petroleum  
Institute*

Steven P. Lehotsky\*  
Scott A. Keller\*  
Michael B. Schon\*  
LEHOTSKY KELLER COHN LLP  
200 Massachusetts Avenue, NW,  
Suite 700

Washington, DC 20001  
Telephone: (512) 693-8350  
Fax: (512) 727-4755  
Email: [steve@lkcfirm.com](mailto:steve@lkcfirm.com)  
Email: [scott@lkcfirm.com](mailto:scott@lkcfirm.com)  
Email: [mike@lkcfirm.com](mailto:mike@lkcfirm.com)

Matthew H. Frederick\*  
LEHOTSKY KELLER COHN LLP  
408 W. 11th Street, 5th Floor  
Austin, TX 78701  
Telephone: (512) 693-8350  
Fax: (512) 727-4755  
Email: [matt@lkcfirm.com](mailto:matt@lkcfirm.com)

Jared B. Magnuson\*  
LEHOTSKY KELLER COHN LLP  
3280 Peachtree Road NE  
Atlanta, GA 30305  
Telephone: (512) 693-8350  
Fax: (512) 727-4755  
Email: [jared@lkcfirm.com](mailto:jared@lkcfirm.com)

*Counsel for Plaintiffs the Chamber of Commerce  
of the United States of America and American  
Petroleum Institute*

*\*pro hac vice forthcoming*